

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

ZAVIUS AVERETTE,  
Plaintiff,

v.

Lt. WILLIE COPELAND, et al.,  
Defendants,

2006 OCT 25 A 10 35

RECEIVED  
U.S. DISTRICT COURT  
MIDDLE DISTRICT ALA.

2:06-CV-322-MHT

Pursuant to Rule 34, Fed. R. Civ. P., the plaintiff request that the defendants produce the documents listed herein within 30 days, either by producing the documents by copies to plaintiff or, by making available to plaintiff for inspection and copying.

- (1) Any and all grievances, complaints, or other documents received by defendants or their agents concerning the mistreatment of inmates by the defendants Lt. Willie Copeland and c.o.z. Mr. Latimore.
- (2) A complete copy of standard operating procedures (S.O.P.) for governing the use of force.
- (3) A complete copy of plaintiff's medical record, during his time period spent in the infirmary Aug.-15-2004.
- (4) A complete copy of all investigative reports done by x & x investigator Mr. Ed Sasser, who upon interviewing made a recording of what he personally witnessed while plaintiff was submitted in the infirmary.

(5.) A deposition in transcript form of the recording of a & a investigator Mr. Ed Jasser of the interview of plaintiff done the 8/24/04.

Wherefore, premises considered plaintiff respectfully requests that defendants produce the above and forementioned documents pursuant to Rule 34 Fed. R. Civ. P., and local Rule 26.1. Done this 20 day of OCT, 2006.

"CERTIFICATE OF SERVICE"

I hereby certify that I have this 20 Day of OCT, 2006. served a copy of the foregoing on defendants counsel(s), by placing same in the United States Mail, postage pre-paid and addressed as follows;

Staff Attorneys  
Benjamin H. Albritten  
Richard B. Garrett  
P.O. Box 270  
Montgomery, AL 35146

CLERK OF COURT  
United States District Court  
P.O. Box 711  
Montgomery, AL 36101-0711